

**Objection Deadline: December 15, 2023**

BURNS BAIR LLP

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*Special Insurance Counsel to the Official Committee  
of Unsecured Creditors of The Roman Catholic Diocese  
of Rockville Centre, New York*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:

THE ROMAN CATHOLIC DIOCESE OF  
ROCKVILLE CENTRE, NEW YORK,  
Debtor.

Chapter 11

Case No. 20-12345 (MG)

**THIRTY-SIXTH MONTHLY FEE STATEMENT OF BURNS BAIR LLP,  
AS SPECIAL INSURANCE COUNSEL TO THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS FOR PROFESSIONAL SERVICES RENDERED  
AND DISBURSEMENTS INCURRED FOR THE PERIOD FROM  
OCTOBER 1, 2023 THROUGH OCTOBER 31, 2023**

Name of Applicant:	<u>Burns Bair LLP</u>
Authorized to Provide Professional Services to:	<u>Official Committee of Unsecured Creditors</u>
Date of Retention:	Effective October 29, 2020 pursuant to Order dated December 9, 2020 [Docket No. 246]
Period for which compensation and reimbursement is sought:	<u>October 1, 2023 – October 31, 2023</u>
Amount of Compensation sought as actual, reasonable, and necessary:	<u>\$138,055.75</u> <u>80% of which is \$110,444.60</u>
Amount of Expense Reimbursement sought as actual, reasonable, and necessary:	<u>\$2,333.60</u>
TOTAL (80% of fees and 100% of costs)	<u>\$112,778.20</u>

**This is the thirty-sixth monthly fee statement.**

**PRELIMINARY STATEMENT**

Burns Bair LLP (“Burns Bair”), as Special Insurance Counsel to the Official Committee of Unsecured Creditors (the “Committee”) of The Roman Catholic Diocese of Rockville Centre, New York (the “Debtor”), hereby submits this thirty-sixth monthly statement (the “Monthly Statement”) for the period from October 1, 2023 through October 31, 2023 (the “Statement Period”) for payment of professional services rendered and reimbursement of expenses incurred during the Statement Period pursuant to the Court’s *Order Authorizing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* dated November 4, 2020 [Docket No. 129] (the “Interim Compensation Order”). Burns Bair requests interim allowance and payment of compensation in the amount of \$110,444.60 (80% of \$138,055.75) for fees on account of reasonable and necessary professional services rendered to the Committee by Burns Bair, and (b) reimbursement of actual and necessary costs and expenses in the amount of \$2,333.60.

**FEES FOR SERVICES RENDERED DURING THE STATEMENT PERIOD**

1. Set forth below is a list of the positions of the Burns Bair professionals and paraprofessionals who provided services to the Committee during the Statement Period, their respective billing rates, and the aggregate hours spent by each professional and paraprofessional in providing services on behalf of the Committee during the Statement Period.

Name	Title	Year of Partnership	Year of Admission	Hourly Rate	Total Hours Billed	Total Compensation
Timothy Burns	Partner	2008	1991	\$975.00	68.20	\$66,495.00
Timothy Burns – Travel				\$487.50	9.80	\$4,777.50
Jesse Bair	Partner	2020	2013	\$625.00	51.20	\$32,000.00
Jesse Bair – Travel				\$312.50	9.70	\$3,031.25
Brian Cawley	Associate	N/A	2020	\$420.00	55.90	\$23,478.00
Karin Jonch-Clausen	Associate	N/A	2020	\$420.00	19.10	\$8,022.00
Brenda Horn-Edwards	Paralegal	N/A	N/A	\$360.00	.70	\$252.00
<b>TOTAL:</b>					<b>214.60</b>	<b>\$138,055.75</b>

2. The rates charged by Burns Bair for services rendered to the Committee are the same rates that it charges generally for professional services rendered to its non-bankruptcy clients. A complete itemization of tasks performed by these professionals and paraprofessionals for the Statement Period is annexed hereto as **Exhibit A**.

**EXPENSES INCURRED DURING THE STATEMENT PERIOD**

3. Set forth below is a categorical list of expenses incurred by Burns Bair during the Statement Period in the course of representing the Committee.

<b>Date</b>	<b>Description</b>	<b>Amount</b>
10/1/2023	Third Quarter 2023 PACER	\$68.20
10/23/2023	Delta Airlines, inflight WiFi, J. Bair	\$15.95
10/23/2023	Delta Airlines, inflight WiFi, J. Bair	\$15.95
10/23/2023	Delta Airlines, J. Bair (MSN-LGA)	\$947.80
10/23/2023	Uber, T. Burns and J. Bair	\$159.57
10/23/2023	Delta Airlines, T. Burns (MSN-LGA)	\$947.80
10/23/2023	MSN Airport Parking, J. Bair	\$10.00
10/23/2023	Uber, J. Bair and T. Burns	\$151.95
10/23/2023	Travel meal, J. Bair	\$16.38
	<b>TOTAL:</b>	<b>\$2,333.60</b>

**NOTICE AND OBJECTION PROCEDURES**

4. No trustee or examiner has been appointed in these chapter 11 cases. Pursuant to the Interim Compensation Order, Burns Bair has provided notice of this statement upon the following parties by electronic or first class mail: (a) the Debtor c/o The Roman Catholic Diocese of Rockville Centre, 50 N Park Ave P.O. Box 9023, Rockville Centre, NY 11571-9023 (Attn: Thomas Renker); (b) the attorneys for the Debtor, Jones Day, 250 Vesey Street, New York, NY 10281 (Attn: Corinne Ball, Esq., Benjamin Rosenblum, Esq. and Andrew M. Butler, Esq.); and (c) the Office of the United States Trustee Region 2 (the “U.S. Trustee”), 201 Varick Street, Suite 1006, New York, NY 10014 (Attn: Greg Zipes, Esq. and Shara Cornell, Esq.). Burns Bair submits that no other or further notice need be provided.

5. Pursuant to the Interim Compensation Order, objections to this Monthly Statement, if any, must be served upon the Application Recipients by December 15, 2023 (the “Objection Deadline”) setting forth the nature of the objection and the amount of fees or expenses at issue.

6. If no objections to this Monthly Statement are made on or before the Objection Deadline, the Debtor shall pay Burns Bair 80% of the fees and 100% of the expenses set forth above. To the extent an objection to this Monthly Statement is timely made, the Debtor shall withhold payment of that portion of the Monthly Statement to which the objection is directed and promptly pay the remainder of the fees and disbursements in the percentages set forth above. To the extent such objection is not resolved; it shall be preserved and presented to the Court at the next interim or final fee application hearing.

Dated: November 30, 2023

BURNS BAIR LLP

/s/ Timothy W. Burns

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*Special Insurance Counsel to the Official  
Committee of Unsecured Creditors of The Roman  
Catholic Diocese of Rockville Centre, New York*

**EXHIBIT A**

## Burns | Bair

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Madison, Wisconsin 53703-3392  
608-286-2302  
www.BurnsBair.com

**The Official Committee of Unsecured Creditors of  
The Roman Catholic Diocese of Rockville Centre**

**Issue Date :** 11/27/2023

**Bill # :** 01269

**Matter:** Insurance

### PROFESSIONAL SERVICES RENDERED

<u>Date</u>	<u>Timekeeper</u>	<u>Narrative</u>	<u>Hours</u>	<u>Amount</u>
10/1/2023	Jesse Bair	Additional analysis re Interstate's letter re its improper disclosure of survivor information (.1); correspondence with PSZJ re same and potential Rule 2004 motion to Interstate re same (.1)	0.20	\$125.00
10/2/2023	Timothy Burns	Review Arrowood correspondence re Arrowood's 2004 production (.1);	0.10	\$97.50
10/2/2023	Timothy Burns	Prepare insurance points for counteroffer (1.9); participate in call with state court counsel re same (.2); conference with J. Bair re same (.2); review and revise J. Bair's edits re same (.2);	2.50	\$2,437.50
10/2/2023	Jesse Bair	Analyze Judge Glenn's order denying the Committee's Section 349 derivative standing motion (.3); conference with T. Burns re same (.2);	0.50	\$312.50
10/2/2023	Timothy Burns	Participate in Zoom mediation session (2.1); participate in state court counsel meeting re outcome of same and mediation next-steps (1.3);	3.40	\$3,315.00
10/2/2023	Jesse Bair	Conference with T. Burns re ongoing projects and associate assignments (.2); Participate in BB team meeting re same, case status, and next-steps (.2);	0.40	\$250.00
10/2/2023	Timothy Burns	Conference with J. Bair re case status and order on derivative standing (.2); conference with J. Bair re ongoing projects and associate assignments (.2); participate in BB team meeting re case assignments and developments (.2);	0.60	\$585.00
10/2/2023	Jesse Bair	Review and edit draft counteroffer proposal (.2);	0.20	\$125.00

10/2/2023	Jesse Bair	Prepare for state court counsel meeting re mediation next-steps (.2); participate in state court counsel meeting re same (1.3);	1.50	\$937.50
10/2/2023	Timothy Burns	Review correspondence from mediator re LMI's bracket counter (.1);	0.10	\$97.50
10/2/2023	Brian Cawley	Participate in BB team meeting regarding case projects and status (.2);	0.20	\$84.00
10/2/2023	Timothy Burns	Review J. Stang correspondence re deal points of counteroffer to Diocese (.1);	0.10	\$97.50
10/2/2023	Timothy Burns	Review J. Bair correspondence with Arrowood re protective order and production status (.1);	0.10	\$97.50
10/2/2023	Timothy Burns	Review correspondence with J. Bair, PSZJ, and the Diocese re sharing information re Arrowood with certain parties (.2);	0.20	\$195.00
10/2/2023	Brian Cawley	Participate in portion of Zoom mediation session (1.9);	1.90	\$798.00
10/2/2023	Jesse Bair	Participate in conference with T. Burns re insurance points for counteroffer (.2); review and edit same (.4);	0.60	\$375.00
10/2/2023	Jesse Bair	Participate in Zoom mediation session (2.1);	2.10	\$1,312.50
10/2/2023	Jesse Bair	Review Diocese correspondence re request to share Arrowood information with certain parties (.1); correspondence with PSZJ re same (.1);	0.20	\$125.00
10/2/2023	Jesse Bair	Correspondence with Arrowood re draft protective order and document production status (.2);	0.20	\$125.00
10/2/2023	Jesse Bair	Draft insurance case update summary to the Committee and state court counsel, including summary of derivative standing decision and oral argument (.4);	0.40	\$250.00
10/2/2023	Brian Cawley	Participate in state court counsel meeting regarding mediation session outcome and mediation next-steps (1.3);	1.30	\$546.00
10/3/2023	Brian Cawley	Participate in portion of state court counsel meeting re mediation strategy, next-steps, and counter to latest Diocese offer (1.4);	1.40	\$588.00
10/3/2023	Jesse Bair	Review additional correspondence with the Diocese and Arrowood re PO issues and potential sharing of Arrowood financial information with additional parties (.1);	0.10	\$62.50
10/3/2023	Jesse Bair	Prepare for state court counsel meeting re mediation strategy, next-steps, and counter to latest Diocese offer (.2); participate in state court counsel meeting for insurance purposes re same (2.5); participate in post-meeting call with T. Burns re outcome of same and next-steps (.1);	2.80	\$1,750.00

10/3/2023	Timothy Burns	Prepare for state court counsel meeting re mediation strategy, next-steps, and counter to latest Diocese offer (.4); participate in call with particular state court counsel re insurance aspects of counter (.2); participate in call with second state court counsel group re same (1.0); participate in state court counsel meeting re same (2.5); participate in follow-up call re same with J. Bair (.1);	4.20	\$4,095.00
10/3/2023	Jesse Bair	Review LMI's latest counter offer (.1);	0.10	\$62.50
10/3/2023	Jesse Bair	Correspondence with Arrowood re document production status (.1);	0.10	\$62.50
10/3/2023	Jesse Bair	Correspondence with the Diocese re potential sharing of Arrowood information (.1);	0.10	\$62.50
10/4/2023	Jesse Bair	Review correspondence from state court counsel re potential insurance Plan provisions (.1);	0.10	\$62.50
10/4/2023	Brian Cawley	Participate in Committee meeting re counter to the Diocese's last mediation offer (1.5); participate in post-meeting conference with T. Burns re outcome of same and next-steps (.2); draft summary of meeting notes for partner review (.2);	1.90	\$798.00
10/4/2023	Jesse Bair	Participate in Committee meeting for insurance purposes re counter to the Diocese's last mediation offer (1.5);	1.50	\$937.50
10/4/2023	Karin Jonch-Clausen	Analyze Arrowood financial information in connection with forthcoming Arrowood Rule 2004 document production (1.4);	1.40	\$588.00
10/4/2023	Timothy Burns	Prepare for Committee meeting (.3); participate in Committee meeting for insurance purposes re counter to the Diocese's last mediation offer (1.5);	1.80	\$1,755.00
10/4/2023	Jesse Bair	Conference with T. Burns re finalization of the Committee's response to the Diocese's counter (.2);	0.20	\$125.00
10/4/2023	Timothy Burns	Participate in call with state court counsel re Committee counter to the Diocese (.2); conference with J. Bair re same (.2);	0.40	\$390.00
10/4/2023	Karin Jonch-Clausen	Participate in conference with B. Cawley re Arrowood financial condition issues (.2);	0.20	\$84.00
10/4/2023	Jesse Bair	Review and respond to correspondence with K. Dine and T. Burns re the Diocese's position on the insurance demand letter lift stay motion and potential call with the Diocese to discuss same (.2);	0.20	\$125.00
10/4/2023	Timothy Burns	Review and respond to email with K. Dine and J. Bair re meeting with the Debtor re the Committee's lift stay motion (.2);	0.20	\$195.00



10/4/2023	Jesse Bair	Review and edit draft Committee response to the Diocese's latest mediation offer (.1);	0.10	\$62.50
10/4/2023	Timothy Burns	Consideration of insurance components re Committee counter (.8);	0.80	\$780.00
10/4/2023	Timothy Burns	Participate in call with J. Stang re counteroffer to Diocese (.2);	0.20	\$195.00
10/4/2023	Brian Cawley	Prepare materials summarizing Arrowood financial condition issues in connection with upcoming Rule 2004 discovery production (1.4); participate in conference with K. Jonch-Clausen re same (.2); identify key insurance commissioner materials in connection with Arrowood financial condition issues (.4);	2.00	\$840.00
10/4/2023	Timothy Burns	Participate in post-meeting conference with B. Cawley re outcome of same and next-steps (.2);	0.20	\$195.00
10/5/2023	Jesse Bair	Provide instructions to B. Cawley re analysis needed in connection with motion to lift stay reply brief (.1);	0.10	\$62.50
10/5/2023	Jesse Bair	Review and respond to correspondence with the Debtor re insurance lift stay issues (.2);	0.20	\$125.00
10/5/2023	Jesse Bair	Review K. Dine correspondence re Interstate's privacy breach and potential next-steps re same (.1);	0.10	\$62.50
10/5/2023	Brian Cawley	Conference with J. Bair re upcoming motion for relief from stay reply briefing re insurance demands (.1);	0.10	\$42.00
10/5/2023	Jesse Bair	Review and edit revised version of the Committee's counter to the Diocese's latest mediation offer (.1); correspondence with PSZJ re same (.1);	0.20	\$125.00
10/5/2023	Brian Cawley	Analyze Syracuse briefing on insurance motion for relief from stay in preparation for drafting the Committee's reply in support of same in DRVC case (2.3);	2.30	\$966.00
10/5/2023	Timothy Burns	Call with state court counsel re Interstate privacy breach (.2); call with J. Stang re same (.2); review and analysis of issue (.8);	1.20	\$1,170.00
10/5/2023	Timothy Burns	Review correspondence with B. Michael, J. Stang, and J. Bair re modification of Committee settlement offer (.2); review correspondence with J. Bair and PSZJ re Debtor meet and confer re insurance motion to lift stay (.2); preparation of final version of insurance counter offer language and review revised language re same (.8);	1.20	\$1,170.00
10/5/2023	Jesse Bair	Correspondence with I. Nasatir re recent ruling in Syracuse bankruptcy re insurance lift stay motion (.1);	0.10	\$62.50
10/6/2023	Jesse Bair	Brief review re Arrowood's 2004 document production (.1);	0.10	\$62.50

10/6/2023	Timothy Burns	Prepare for meet and confer with the Diocese re lift stay motion (.5); participate in meet and confer with the Diocese re same (.5); participate in post-call with I. Nasatir and J. Bair re outcome of same and next-steps (.2); participate in conference with J. Bair re lift stay strategy (.2);	1.40	\$1,365.00
10/6/2023	Jesse Bair	Participate in conference with T. Burns re lift stay strategy (.2);	0.20	\$125.00
10/6/2023	Brian Cawley	Continue analyzing Syracuse briefing on insurance motion for relief from stay, with particular focus on the insurers' opposition briefs, in connection with preparation for drafting the Committee's reply in support of same in DRVC case (2.2);	2.20	\$924.00
10/6/2023	Brian Cawley	Participate in conference with J. Bair re supplemental research needed re lift stay motion (.2); research case law re the parameters of an insurer's right to discovery, if any, upon receipt of an insurance settlement demand (3.7); draft summary of research results for partners (.5);	4.40	\$1,848.00
10/6/2023	Jesse Bair	Prepare for meet and confer with the Diocese re lift stay motion (.2); participate in meet and confer with the Diocese re same (.5); participate in post-call with I. Nasatir and T. Burns re outcome of same and next-steps (.2);	0.90	\$562.50
10/6/2023	Jesse Bair	Participate in conference with B. Cawley re additional research needed in connection with lift stay motion and reply brief (.2);	0.20	\$125.00
10/9/2023	Brian Cawley	Participate in portion of Zoom mediation session (3.0);	3.00	\$1,260.00
10/9/2023	Timothy Burns	Prepare for Zoom mediation session (.2); participate in Zoom mediation session (3.3);	3.50	\$3,412.50
10/9/2023	Timothy Burns	Review and revise 2004 motion re Interstate and ISO (.8); review email from K. Dine to team re same (.1); review notice of hearing re Interstate/ISO 2004 exam (.1);	1.00	\$975.00
10/9/2023	Jesse Bair	Review and edit the Committee's Rule 2004 motion re Interstate's privacy breach and proposed discovery topics re same (1.1);	1.10	\$687.50
10/9/2023	Brian Cawley	Prepare claimant demand matrix (.3);	0.30	\$126.00
10/9/2023	Jesse Bair	Participate in Zoom mediation session (3.3);	3.30	\$2,062.50
10/9/2023	Brian Cawley	Draft summary of recent mediation sessions for partner review (1.0);	1.00	\$420.00
10/9/2023	Jesse Bair	Review transcript of September 27 Arrowood discovery hearing (.1);	0.10	\$62.50

10/10/2023	Brian Cawley	Analyze hearing transcript of Syracuse insurance motion to lift stay in connection with the Committee's insurance motion to lift stay in DRVC, reply brief, and hearing preparations (1.8);	1.80	\$756.00
10/10/2023	Timothy Burns	Review Arrowood's document production (.8); participate in call with J. Stang re same (.2); conference with J. Bair re same (.3); review J. Bair correspondence with Arrowood re document production issues (.2);	1.50	\$1,462.50
10/10/2023	Jesse Bair	Correspondence with B. Michael re upcoming Committee insurance meeting (.1);	0.10	\$62.50
10/10/2023	Jesse Bair	Analyze B. Cawley research results re scope of insurers' discovery rights to respond to demand letters (.2);	0.20	\$125.00
10/10/2023	Jesse Bair	Draft correspondence to Arrowood re deficiencies in Arrowood's Rule 2004 discovery responses (.6);	0.60	\$375.00
10/10/2023	Timothy Burns	Participate in conference with B. Cawley re insurance motion for relief from stay briefing and strategy (.4); participate in conference with J. Bair re same (.2);	0.60	\$585.00
10/10/2023	Jesse Bair	Draft correspondence to the Debtor re potential resolution of the insurance lift stay motion (.5);	0.50	\$312.50
10/10/2023	Jesse Bair	Participate in conference with T. Burns re motion for relief from stay insurance strategy (.2);	0.20	\$125.00
10/10/2023	Jesse Bair	Participate in additional conference with T. Burns re case insurance next-steps, including Arrowood discovery issues and additional discussions re lift stay motion (.3);	0.30	\$187.50
10/10/2023	Jesse Bair	Review the Committee's notice of request for a status conference re Interstate's privacy breach (.1);	0.10	\$62.50
10/10/2023	Jesse Bair	Continue analyzing Arrowood's Rule 2004 discovery responses and production (.3);	0.30	\$187.50
10/10/2023	Brian Cawley	Participate in conference with T. Burns re insurance motion for relief from stay briefing and strategy (.4);	0.40	\$168.00
10/11/2023	Jesse Bair	Review monthly Diocesan PSIP information (.1);	0.10	\$62.50
10/11/2023	Timothy Burns	Review correspondence with PSZJ and Interstate re Interstate's privacy breach (.2); conference with with J. Bair re Interstate meet and confer outcome (.1);	0.30	\$292.50
10/11/2023	Jesse Bair	Participate in conference with T. Burns re outcome of privacy breach meet and confer with Interstate (.1);	0.10	\$62.50

10/11/2023	Jesse Bair	Participate in meet and confer with Interstate re privacy breach issue and associated document production and other discovery (.4);	0.40	\$250.00
10/11/2023	Jesse Bair	Prepare for privacy breach meet and confer with Interstate (.1);	0.10	\$62.50
10/12/2023	Jesse Bair	Review correspondence with K. Dine and Interstate re Rule 2004 meet and confer (.1);	0.10	\$62.50
10/12/2023	Timothy Burns	Review correspondence with J. Bair and Arrowood re Rule 2004 protective order (.1);	0.10	\$97.50
10/12/2023	Timothy Burns	Review order re status conference re Interstate's privacy breach (.1);	0.10	\$97.50
10/12/2023	Jesse Bair	Correspondence with Arrowood re draft 2004 protective order (.1);	0.10	\$62.50
10/13/2023	Jesse Bair	Participate in Rule 2004 meet and confer with the Insurance Services Office (.1);	0.10	\$62.50
10/13/2023	Jesse Bair	Analysis re lift stay issues in connection with upcoming hearing (.1);	0.10	\$62.50
10/13/2023	Jesse Bair	Review and edit Arrowood's proposed Rule 2004 protective order (.7);	0.70	\$437.50
10/16/2023	Timothy Burns	Conference with J. Bair re Arrowood 2004 production issues (.2);	0.20	\$195.00
10/16/2023	Jesse Bair	Participate in state court counsel meeting for insurance purposes re case strategy, insurance issues, and potential dismissal (1.1); participate in conference with T. Burns re outcome of same and next-steps (.2);	1.30	\$812.50
10/16/2023	Jesse Bair	Participate in conference with T. Burns re motion for relief from stay reply brief and oral argument (.2); participate in conference with T. Burns re Arrowood 2004 production issues (.2);	0.40	\$250.00
10/16/2023	Jesse Bair	Correspondence with B. Michael re Committee insurance meeting (.1);	0.10	\$62.50
10/16/2023	Jesse Bair	Correspondence with B. Cawley re Committee offer to resolve the motion to lift stay (.1);	0.10	\$62.50
10/16/2023	Timothy Burns	Conference with J. Bair re motion for relief from stay reply brief and oral argument (.2);	0.20	\$195.00
10/16/2023	Timothy Burns	Review and analysis of offered compromise to Diocese re motion for relief and Diocese's response to same (.4);	0.40	\$390.00
10/16/2023	Brian Cawley	Conference with T. Burns re responding to objections to the Committee's insurance motion to lift stay (.2); analyze insurers and debtors objections (2.1); analyze case law relevant to same (1.8);	4.10	\$1,722.00
10/16/2023	Karin Jonch-Clausen	Review the Committee's insurance motion to lift stay and objections to same in preparation for reply brief (1.8);	1.80	\$756.00

10/16/2023	Timothy Burns	Prepare for state court counsel meeting (.2); participate in state court counsel meeting for insurance purposes re case developments and strategy (1.1); conference with J. Bair re outcome of same and next steps (.2);	1.50	\$1,462.50
10/16/2023	Timothy Burns	Review case law re insurer standing in connection with insurance motion for relief from stay oral argument (1.4);	1.40	\$1,365.00
10/16/2023	Timothy Burns	Conference with B. Cawley re motion for relief from stay reply brief (.2);	0.20	\$195.00
10/17/2023	Karin Jonch-Clausen	Participate in conference with T. Burns and B. Cawley re reply brief drafting and strategy (.8);	0.80	\$336.00
10/17/2023	Jesse Bair	Draft correspondence to state court counsel re the insurance lift stay hearing and call to discuss same (.3); additional analysis of lift stay hearing issues in connection with same (.2);	0.50	\$312.50
10/17/2023	Timothy Burns	Review objections to motion for relief from stay to formulate outline for reply (2.6); conference with B. Cawley and K. Jonch-Clausen re reply brief drafting and strategy (.8); review and respond to multiple emails re Committee questions re insurance (.4); conference with J. Bair re same (.2);	4.00	\$3,900.00
10/17/2023	Karin Jonch-Clausen	Research and analyze case law re insurer standing (1.4); draft section on insurer standing for reply in support of motion to lift stay (1.1); correspondence with B. Cawley re same (.1); Analyze case law re an insurer's duty to promptly settle and the right to investigate in the context of receiving insurance demand letters (2.0);	4.60	\$1,932.00
10/17/2023	Jesse Bair	Correspondence with PSZJ re the Committee's lift stay reply brief (.1);	0.10	\$62.50
10/17/2023	Jesse Bair	Correspondence with PSZJ and B. Cawley re potential exhibit to the Committee's lift stay reply brief (.2);	0.20	\$125.00
10/17/2023	Jesse Bair	Correspondence with state court counsel re the lift stay hearing (.1);	0.10	\$62.50
10/17/2023	Jesse Bair	Correspondence with the Committee re upcoming insurance meeting (.1);	0.10	\$62.50
10/17/2023	Brian Cawley	Participate in conference with T. Burns and K. Jonch-Clausen re reply brief drafting and strategy (.8); begin drafting insurance lift-stay reply brief (5.7); research case law relied upon in lift stay objections and begin distinguishing same (3.2);	9.70	\$4,074.00
10/17/2023	Jesse Bair	Brief review re the insurers' and Diocese's lift stay objections (.2);	0.20	\$125.00

10/17/2023	Jesse Bair	Review and respond to additional correspondence with the Committee re upcoming insurance meeting (.3); correspondence with PSZJ re same and status of insurance adversary proceedings post-dismissal (.1);	0.40	\$250.00
10/18/2023	Jesse Bair	Review correspondence with Interstate, K. Dine, and the debtor re Interstate declaration and document production (.1);	0.10	\$62.50
10/18/2023	Jesse Bair	Review LMI's objection to the Committee's insurance lift stay motion (.5);	0.50	\$312.50
10/18/2023	Jesse Bair	Review Interstate's objection to the Committee's insurance lift stay motion (.3);	0.30	\$187.50
10/18/2023	Karin Jonch-Clausen	Draft Sonnax Factor sections of lift stay reply brief (2.8);	2.80	\$1,176.00
10/18/2023	Brian Cawley	Continue drafting lift-stay motion reply brief (7.0); continue researching case law relevant to lift stay motion (1.6);	8.60	\$3,612.00
10/18/2023	Jesse Bair	Review Lexington's objection to the Committee's insurance lift stay motion (.1);	0.10	\$62.50
10/18/2023	Jesse Bair	Review the Diocese's objection to the Committee's insurance lift stay motion (.2);	0.20	\$125.00
10/18/2023	Timothy Burns	Conference with J. Bair re lift stay reply brief and hearing strategy (.3); review and revise draft reply brief (1.6);	1.90	\$1,852.50
10/18/2023	Jesse Bair	Participate in conference with T. Burns re lift stay reply brief and hearing strategy (.3);	0.30	\$187.50
10/18/2023	Jesse Bair	Review the Diocese's response to the Committee's proposed resolution of the lift stay motion (.1);	0.10	\$62.50
10/18/2023	Karin Jonch-Clausen	Review and edit reply brief section on Pre-Petition Rights (.8); Research duty to cooperate in discovery and insurers' ability to pursue any breach claims in the coverage action (.4);	1.20	\$504.00
10/18/2023	Jesse Bair	Review and edit B. Cawley's draft outline of the Committee's motion to lift stay reply brief (.2); review the Committee's original motion/joinder in connection with same (.2);	0.40	\$250.00
10/18/2023	Timothy Burns	Review and respond to correspondence re meeting with Committee members re insurance questions (.2); participate in call with state court counsel re same (.2); review mediators' status report (.1); review correspondence with PSZJ and the Committee re same (.1); conference with J. Bair re same (.1);	0.70	\$682.50
10/18/2023	Jesse Bair	Review order granting discovery extension in the Arrowood district court action (.1);	0.10	\$62.50

10/18/2023	Karin Jonch-Clausen	Research case law re test cases and bellwether cases in mass tort litigation (1.2); draft section of reply brief concerning test case issue (.3);	1.50	\$630.00
10/18/2023	Karin Jonch-Clausen	Draft reply brief section addressing the insurers' purported discovery concerns with responding to demands (1.3);	1.30	\$546.00
10/18/2023	Jesse Bair	Review Arrowood's objection to the Committee's insurance lift stay motion (.1);	0.10	\$62.50
10/18/2023	Jesse Bair	Review the mediators' report (.1); participate in conference with T. Burns re same (.1);	0.20	\$125.00
10/19/2023	Jesse Bair	Review the Diocese's letter to the Court re mediation status and offer (.1);	0.10	\$62.50
10/19/2023	Jesse Bair	Participate in conference with state court counsel re strategy and preparation for upcoming insurance lift stay hearing (.4); follow-up correspondence with state court counsel re claim-specific objections raised by LMI (.1);	0.50	\$312.50
10/19/2023	Brian Cawley	Implement partner edits into lift stay reply (1.8); supplemental research re insurer standing in connection with lift stay reply brief (1.6);	3.40	\$1,428.00
10/19/2023	Jesse Bair	Draft motion to lift stay oral argument talking points for state court counsel (.5);	0.50	\$312.50
10/19/2023	Jesse Bair	Review draft Committee response to the Diocese's letter to the Court re mediation status and offer (.1);	0.10	\$62.50
10/19/2023	Jesse Bair	Correspond with Committee members re upcoming Committee insurance meeting (.1);	0.10	\$62.50
10/19/2023	Timothy Burns	Prep for Committee insurance meeting (.8) participate in Committee meeting re insurance strategy (.8);	1.60	\$1,560.00
10/19/2023	Jesse Bair	Prepare for Committee insurance meeting (.1); participate in Committee insurance meeting (.7);	0.80	\$500.00
10/19/2023	Timothy Burns	Conference with J. Bair re lift stay hearing and related insurance case issues (.2);	0.20	\$195.00
10/19/2023	Timothy Burns	Additional consideration of issues re mediators' report (.1);	0.10	\$97.50
10/19/2023	Jesse Bair	Conference with T. Burns re lift stay hearing and related insurance case issues (.2);	0.20	\$125.00
10/19/2023	Karin Jonch-Clausen	Send e-mail regarding findings on standing in the second circuit to B. Cawley (.2);	0.20	\$84.00
10/19/2023	Timothy Burns	Review Debtor letter to court re mediation status and offer (.2); review the Committee's draft response to same (.2) review correspondence with PSZJ and state court counsel re same (.2);	0.60	\$585.00
10/19/2023	Jesse Bair	Review and edit the Committee's insurance lift stay reply brief (1.3);	1.30	\$812.50

10/19/2023	Karin Jonch-Clausen	Research second circuit case law supporting the proposition that insurers have no standing if their prepetition rights are not impacted (1.4);	1.40	\$588.00
10/19/2023	Timothy Burns	Review correspondence from state court counsel re lift stay motion (.1); review correspondence from J. Bair to state court counsel re same (.1);	0.20	\$195.00
10/19/2023	Timothy Burns	Review draft state court counsel talking points re lift stay motion (.2);	0.20	\$195.00
10/20/2023	Jesse Bair	Revise and edit the Committee's motion to lift stay reply brief, including incorporation of suggested edits from K. Dine (.3); correspondence with PSZJ re same (.1);	0.40	\$250.00
10/20/2023	Timothy Burns	Review final of response to Debtor mediation status letter to court (.1); review and respond to correspondence with J. Bair and PSZJ re filing and finalizing reply brief (.3);	0.40	\$390.00
10/20/2023	Jesse Bair	Review revised version of the Committee's letter to the Court re the Debtor's disclosure of mediation offer (.1); review correspondence with PSZJ and state court counsel re same (.1);	0.20	\$125.00
10/20/2023	Karin Jonch-Clausen	Identify key materials for use during motion to lift stay hearing preparation (1.6);	1.60	\$672.00
10/20/2023	Timothy Burns	Review of 2004 motion re Interstate's privacy breach (.2); review of adjournment of status hearing re 2004 request (.1); review Green affidavit re 2004 of Interstate (.2);	0.50	\$487.50
10/20/2023	Brian Cawley	Correspond with K. Jonch-Clausen re lift-stay hearing preparations (.2)	0.20	\$84.00
10/22/2023	Jesse Bair	Correspondence with T. Burns re status of Arrowood 2004 document deficiency corrections (.1);	0.10	\$62.50
10/22/2023	Jesse Bair	Respond to correspondence with state court counsel re motion to lift stay hearing strategy (.1);	0.10	\$62.50
10/22/2023	Timothy Burns	Prepare for motion to lift stay oral argument (7.8);	7.80	\$7,605.00
10/23/2023	Jesse Bair	Prepare for motion to lift stay hearing (.3);	0.30	\$187.50
10/23/2023	Jesse Bair	Participate in conference with K. Dine and T. Burns re lift stay and status conference hearing outcome and next-steps (.3); participate in additional conference with T. Burns re same and ongoing case insurance initiatives (.3);	0.60	\$375.00
10/23/2023	Jesse Bair	Participate in motion to lift stay insurance hearing (1.8);	1.80	\$1,125.00
10/23/2023	Timothy Burns	Return travel to Madison from insurance hearing [billed at 1/2 travel rate] (5.7);	5.70	\$2,778.75



10/23/2023	Timothy Burns	Travel to New York for insurance hearing [billed at 1/2 travel rate] (4.1);	4.10	\$1,998.75
10/23/2023	Timothy Burns	Conference with J. Bair re motion to lift stay hearing strategy (.4); continue preparing for hearing (3.1); participate in hearing on motion for relief from stay and case status hearing (1.8); post-hearing conference with K. Dine and J. Bair re outcome of same and next-steps (.3); conference with J. Bair re same and case insurance initiatives (.3); participate in call with J. Stang re hearing outcome and next-steps (.2); participate in call with state court counsel re same (.2), participate in call with additional state court counsel re same (.2);	6.50	\$6,337.50
10/23/2023	Jesse Bair	Travel to New York for insurance hearing [billed at 1/2 travel rate] (4.0);	4.00	\$1,250.00
10/23/2023	Jesse Bair	Return travel to Madison from insurance hearing [billed at 1/2 ravel rate] (5.7);	5.70	\$1,781.25
10/23/2023	Jesse Bair	Review J. Stang correspondence re recent mediator communication (.1);	0.10	\$62.50
10/23/2023	Jesse Bair	Participate in conference with T. Burns re motion to lift stay hearing strategy (.4);	0.40	\$250.00
10/23/2023	Jesse Bair	Review amended agenda for 10/23 hearing (.1);	0.10	\$62.50
10/24/2023	Timothy Burns	Participate in BB team meeting re case status, next-steps, and ongoing projects (.3);	0.30	\$292.50
10/24/2023	Jesse Bair	Participate in conference with PSZJ team and T. Burns re hearing outcome, case next-steps, and upcoming October 31 case resolution deadline (.6);	0.60	\$375.00
10/24/2023	Karin Jonch-Clausen	Participate in BB team meeting re case status, next-steps, and ongoing projects (.3);	0.30	\$126.00
10/24/2023	Jesse Bair	Participate in BB team meeting re case status, next-steps, and ongoing projects (.3);	0.30	\$187.50
10/24/2023	Jesse Bair	Correspondence with state court counsel re insurance demand letters (.1);	0.10	\$62.50
10/24/2023	Jesse Bair	Participate in Committee meeting re hearing outcome, case status, strategy, and next-steps (.9);	0.90	\$562.50
10/24/2023	Timothy Burns	Participate in conference with PSZJ team and J. Bair re hearing outcome, case next-steps, and upcoming October 31 case resolution deadline (.6); participate in state court counsel meeting re same (1.5); participate in post-meeting call with PSZJ and J. Bair re outcome of same (.2); participate in Committee meeting re case next-steps (.9);	3.20	\$3,120.00
10/24/2023	Brian Cawley	Participate in BB team meeting re case status, next-steps, and ongoing projects (.3);	0.30	\$126.00

10/24/2023	Brian Cawley	Search for and send draft insurance demand letters to J. Bair (.2);	0.20	\$84.00
10/24/2023	Jesse Bair	Participate in state court counsel meeting re hearing outcome and case next-steps (1.5); participate in post-conference call with PSZJ and T. Burns re outcome of same and next-steps (.2);	1.70	\$1,062.50
10/25/2023	Jesse Bair	Participate in state court counsel meeting for insurance purposes re case status, strategy, and next steps (1.9); participate in post-meeting conference with PSZJ re outcome of same and next steps (.4); participate in conference with T. Burns re same (.1);	2.40	\$1,500.00
10/25/2023	Timothy Burns	Review Arrowood's response re protective order (.1); correspond with J. Bair re same (.1);	0.20	\$195.00
10/25/2023	Timothy Burns	Review correspondence with PSZJ and state court counsel re upcoming state court counsel meeting (.2);	0.20	\$195.00
10/25/2023	Timothy Burns	Participate in state court counsel meeting for insurance purposes re case status, strategy, and next steps (1.9); participate in post-meeting conference with PSZJ re outcome of same and next steps (.4); participate in conference with J. Bair re same (.1); participate in call with certain state court counsel re same (.2);	2.60	\$2,535.00
10/25/2023	Jesse Bair	Review J. Stang correspondence re meeting with the Debtor and case developments (.1);	0.10	\$62.50
10/26/2023	Brenda Horn-Edwards	Draft BB monthly fee statement (.6); generate and edit Exhibit A to same (.1);	0.70	\$252.00
10/26/2023	Jesse Bair	Review correspondence from state court counsel re test cases (.1); participate in conference with T. Burns re same (.2);	0.30	\$187.50
10/26/2023	Timothy Burns	Review correspondence from state court counsel re test cases (.1); conference with J. Bair re same (.2); review and respond to correspondence from state court counsel re demand letter (.2);	0.50	\$487.50
10/27/2023	Jesse Bair	Correspondence with additional state court counsel re insurance demand letters (.1);	0.10	\$62.50
10/27/2023	Jesse Bair	Correspondence with state court counsel re insurance demand letters (.1);	0.10	\$62.50
10/27/2023	Jesse Bair	Review notes of prior insurance meet and confers with the Diocese (.1); draft correspondence to the Diocese re outstanding insurance discovery requests (.3);	0.40	\$250.00
10/27/2023	Jesse Bair	Review I. Nasatir correspondence re recent Diocesan insurance activities (.1);	0.10	\$62.50

10/28/2023	Timothy Burns	Review and respond to correspondence re settlement discussions and related Committee and state court counsel meetings (.2); participate in call with J. Stang re same (.4);	0.60	\$585.00
10/28/2023	Jesse Bair	Correspondence with B. Michael re upcoming calls to discuss case strategy (.1);	0.10	\$62.50
10/28/2023	Jesse Bair	Participate in call with T. Burns re insurance status and strategy for case next-steps (.1);	0.10	\$62.50
10/29/2023	Timothy Burns	Review correspondence with J. Bair and PSZJ re Diocesan insurance discovery (.1);	0.10	\$97.50
10/30/2023	Jesse Bair	Begin insurance analysis regarding potential test cases (.7);	0.70	\$437.50
10/30/2023	Timothy Burns	Conference with J. Bair re Arrowood discovery deficiencies (.2); participate in call with state court counsel re settlement and dismissal issues (.2); review correspondence re settlement and dismissal issues with PSZJ, state court counsel, and the Committee (.2); participate in conference with PSZJ and J. Bair re dismissal and test case issues (.5); participate in state court counsel meeting re same (1.3); participate in call with particular state court counsel re insurance demand letters (.3);	2.70	\$2,632.50
10/30/2023	Jesse Bair	Respond to Arrowood's correspondence re Arrowood's deficient Rule 2004 discovery responses (.4);	0.40	\$250.00
10/30/2023	Jesse Bair	Participate in conference with PSZJ team and T. Burns re next steps for moving case forward (.5);	0.50	\$312.50
10/30/2023	Jesse Bair	Participate in conference with T. Burns re Arrowood discovery issues (.2);	0.20	\$125.00
10/30/2023	Jesse Bair	Participate in state court counsel meeting for insurance purposes re strategy and next-steps for moving case forward (1.3);	1.30	\$812.50
10/30/2023	Brian Cawley	Analysis re insurance demand information (.3); correspond with J. Bair re same (.1);	0.40	\$168.00
10/31/2023	Jesse Bair	Continue insurance analysis re potential test cases (.1); participate in detailed conference with T. Burns re same (1.3); supplemental analysis re potential test cases (1.0); correspondence with PSZJ re same (.1); correspondence with various state court counsel groups re same (.3);	2.80	\$1,750.00
10/31/2023	Jesse Bair	Correspondence with state court counsel re insurance demand letter question (.1);	0.10	\$62.50
10/31/2023	Brian Cawley	Discuss policy review and test case information projects with T. Burns (.2);	0.20	\$84.00

10/31/2023	Timothy Burns	Review and respond to correspondence from state court counsel re insurance demands (.1); participate in conference with J. Bair re potential test cases (1.3); met with B. Cawley re research assignments re same (.2); further meetings with J. Bair re same (.2); participate in Committee meeting re dismissal and test cases (1.2); participate in post-meeting call with PSZJ and J. Bair re outcome of same and next-steps (.4);	3.40	\$3,315.00
10/31/2023	Jesse Bair	Review correspondence with K. Dine and the Court re potential cancellation of 11/1 hearing (.1);	0.10	\$62.50
10/31/2023	Jesse Bair	Review and respond to follow-up correspondence with state court counsel re potential test cases (.2);	0.20	\$125.00
10/31/2023	Brian Cawley	Compile Arrowood policies from relevant timeline for T. Burns (.6); begin analyzing policies for aggregate limit provisions relevant to CVA claims (1.8);	2.40	\$1,008.00
10/31/2023	Brian Cawley	Begin analyzing coverage issues in connection with potential test cases (2.2);	2.20	\$924.00
10/31/2023	Jesse Bair	Prepare for Committee meeting (.1); participate in Committee meeting re case status, strategy for potential next steps, and test case concept (1.3); participate in portion of post-meeting call with PSZJ and T. Burns re outcome of Committee meeting and next-steps (.3);	1.70	\$1,062.50
<b>Total Hours and Fees</b>			<b>214.60</b>	<b>\$138,055.75</b>

**EXPENSES**

<u>Date</u>	<u>Description</u>	<u>Amount</u>
10/1/2023	Third Quarter 2023 PACER	\$68.20
10/23/2023	Delta Airlines, T. Burns (MSN-LGA, Oct. 23)	\$947.80
10/23/2023	Airport parking, J. Bair	\$10.00
10/23/2023	Delta Airlines, J. Bair (MSN-LGA, Oct. 23)	\$947.80
10/23/2023	Uber, T. Burns and J. Bair (airport to courthouse)	\$159.57
10/23/2023	Travel meal, J. Bair	\$16.38
10/23/2023	Uber, J. Bair and T. Burns (courthouse to airport)	\$151.95
10/23/2023	Delta Airlines Inflight Wi-Fi, J. Bair	\$15.95
10/23/2023	Delta Airlines Inflight Wi-Fi, J. Bair	\$15.95
<b>Total Expenses</b>		<b>\$2,333.60</b>

**Timekeeper Summary**

<b><u>Name</u></b>	<b><u>Title</u></b>	<b><u>Hours</u></b>	<b><u>Rate</u></b>	<b><u>Amount</u></b>
Brenda Horn-Edwards	Paralegal	0.70	\$360.00	\$252.00
Brian Cawley	Associate	55.90	\$420.00	\$23,478.00
Jesse Bair	Partner	9.70	\$312.50	\$3,031.25
Jesse Bair	Partner	51.20	\$625.00	\$32,000.00
Karin Jonch-Clausen	Associate	19.10	\$420.00	\$8,022.00
Timothy Burns	Partner	9.80	\$487.50	\$4,777.50
Timothy Burns	Partner	68.20	\$975.00	\$66,495.00

**Total Due This Invoice: \$140,389.35**